## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA GREAT FALLS DIVISION

MONTANA ENVIRONMENTAL	)
INFORMATION CENTER, et al.,	) No. 4:11-CV-15-GF-SEH
Plaintiffs,	)
	) NOTICE OF ERRATA
V.	) REGARDING STIPULATED
	) AGREEMENT
UNITED STATES BUREAU OF	)
LAND MANAGEMENT, et al.	)
Federal Defendants,	)
V.	)
AMERICAN PETROLEUM	)
INSTITUTE, et al.	)
Intervenor Defendants.	)
	)

On Friday, June 17, 2016 Plaintiffs and Federal Defendants (hereinafter "the Parties") submitted a joint motion to dismiss the above-captioned matter pursuant to an attached stipulated agreement. That stipulated agreement inadvertently omitted, in paragraph 6, the words "attorney fees." That paragraph 6 should

therefore read, in its entirety, and with the inadvertently omitted words "attorney fees" underlined for emphasis, as follows:

This stipulated agreement contains all of the agreements between the Parties. The Parties agree that any other prior or contemporaneous representations or understandings not explicitly contained in this stipulated agreement, whether written or oral, are of no further legal or equitable force or effect. Nothing in this stipulated agreement shall be construed to prohibit or otherwise restrict Plaintiffs from seeking attorney fees and costs pursuant to the Equal Access to Justice Act, 28 U.S.C. § 2412. Federal Defendants reserve the right to oppose any such request. Any subsequent modifications to this stipulated agreement must be in writing, and must be signed and executed by the Parties.

Respectfully submitted this 22nd day of June 2016.

/s/ Sarah K. McMillan Sarah K. McMillan WildEarth Guardians P.O. Box 7516 Missoula, Montana 59807 406.549.3895 smcmillan@wildearthguardians.org

Erik Schlenker-Goodrich Western Environmental Law Center 208 Paseo del Pueblo Sur, Unit 602 Taos, New Mexico 87571 575.613.4197 eriksg@westernlaw.org

Shiloh Hernandez Western Environmental Law Center 103 Reeder's Alley Helena, Montana 59601 406.204.4861 hernandez@gmail.com

## **COUNSEL FOR PLAINTIFFS**

JOHN C. CRUDEN Assistant Attorney General

/s/ Ruth Ann Storey
Ruth Ann Storey
United States Department of Justice
Environment & Natural Resources Division
Natural Resources Section
P.O. Box 7611
Washington, D.C. 20044
(202) 305-0493
ruth.ann.storey@usdoj.gov

**Attorneys for Defendants**